

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH

Case No.: 9:22-CV-80660-RAR

UNITED STATES OF AMERICA;

*Plaintiff,*

v.

PAUL J. MANAFORT, JR,

*Defendant.*

**DEFENDANT'S UNOPPOSED SECOND MOTION FOR EXTENSION OF  
TIME TO RESPOND TO THE GOVERNMENT'S COMPLAINT**

Defendant, through this unopposed Motion, respectfully requests the Court extend his time to Respond to the Complaint by fourteen days. As good cause for the requested extension, Defendant states as follows:

1. The Motion is unopposed. This is the second extension of Defendant's response deadline that Defendant has sought in this case.
2. Defendant's response to the Complaint is presently due on July 27, 2022.
3. The Parties are engaged in settlement discussions that both sides reasonably hope will resolve this case. As part of these settlement discussions, information has been gathered and exchanged by the Parties.
4. Since requesting his prior extension, Defendant has served upon Plaintiff a settlement proposal and supporting information. Defendant served this proposal and supporting information on or about July 12, 2022. Plaintiff is evaluating the proposal, which requires

evaluation by and approval from several constituents within the IRS and the Department of Justice. Plaintiff requires additional time to complete this evaluation.

5. Forcing the Parties to litigate a motion to dismiss or other threshold motions in the meantime will distract from and be detrimental to settlement efforts.

WHEREFORE, Defendant respectfully requests that this Court extend his deadline to respond to the complaint by fourteen days, until **August 10, 2022**.

**LOCAL RULE 7.1(a)(3) CONFERRAL**

The undersigned has conferred with counsel for the Government and the Government does not oppose the relief this motion requests.

Dated: July 22, 2022

Respectfully submitted,

**MARCUS NEIMAN RASHBAUM  
& PINEIRO LLP**

/s/ Derick R. Vollrath

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on July 22, 2022, I filed the foregoing document through the Court's CM/ECF system which has caused service to be made upon all counsel of record in this case.

/s/ Derick Vollrath